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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

IN RE: Bard IVC Filters Products Liability
Litigation

No. 2:15-MD-02641-DGC

**JOINT MOTION AND
INCORPORATED MEMORANDUM
FOR AN ORDER PROTECTING ANY
ATTORNEY-CLIENT PRIVILEGE
AND WORK PRODUCT REVEALED
DURING MEETING AND CONFER
ON PRIVILEGE LOGS**

Defendants C. R. Bard, Inc. and Bard Peripheral Vascular, Inc. (collectively “Bard”) and the plaintiffs hereby jointly move for an order protecting any attorney-client privilege and work product that may be revealed in conjunction with the parties information meet and confer regard entries on Bard's privilege logs and show as follows:

1. The Court ordered the parties to meet and confer regarding the entries on Bard's privilege logs. The parties have agreed to a procedure and memorialized it in the Stipulation attached as Exhibit "A".

2. The parties seek to engage in a meaningful meet and confer regarding Bard's privilege claims, and the parties therefore jointly request that the Court enter an order pursuant to Federal Rule of Evidence 502(d) that any disclosure of protected communications or work-product material in conjunction with that meet and confer shall not constitute a waiver of any attorney client privilege or work product protection.

3. For the foregoing reasons, good cause exists for entry of an order under Federal Rule of Evidence 502(d) that provides that any disclosure of protected communications or material shall not constitute a waiver of such protection. Such an order would appropriately protect the attorney-client privilege and work-product doctrine, and the parties have jointly filed a Proposed Consent Order for the Court's consideration.

DATED this 24th day of November, 2015.

GALLAGHER & KENNEDY, P.A.

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CERTIFICATE OF SERVICE

I hereby certify that on November 24, 2015, the foregoing was electronically filed with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to all attorneys of record.

s/Richard B. North, Jr.